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January 20, 2023

Honorable Ona T. Wang
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

**Re: *Adam Potter v. Beacon Intercontinental Group, Inc., et al.*, No. 1:20-cv-04599-JGK-OTW
Letter-Motion to File Discovery Motion Materials Under Seal**

Dear Judge Wang:

We write on behalf of defendants and counterclaimants Beacon Intercontinental Group and Business Insurance Holdings, Inc., pursuant to Paragraph III(d) and IV of Your Honor's Individual Procedures, and Local Rule 5.2, for permission to file under seal the materials submitted in opposition to a discovery motion.

At a December 13, 2022 pre-motion conference, Your Honor permitted Mr. Potter to file a motion to compel regarding confidentiality designations of certain documents under the operative protective order entered in this case (the "Motion"). *See* Tr. at 59:17-18. Moreover, Your Honor also instructed Mr. Potter to file the supporting materials provisionally under seal because the Motion challenges in part certain confidentiality designations made by Defendants/Counterclaim Plaintiffs Beacon Intercontinental Group, Inc. and Business Insurance Holdings, Inc. *Id.* at 59:25-60:2-19, 64:2-10.

On January 6, 2023, Mr. Potter filed his motion provisionally under seal and we request that our opposition and supporting declaration, filed contemporaneously herewith, be also filed provisionally under seal.

Thank you for Your Honor's time and attention to this matter.

Respectfully submitted,

/s/ Christopher George Oprison

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